



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

**APR 06 1994**

Mr. Doug Clay  
Manager of Permit Section  
Illinois Environmental Protection Agency  
1340 North 9th Street  
P.O. Box 19276  
Springfield, IL 62794-9276

RE: Request to expedite special waste permit for stabilized waste from the NL Industries/Taracorp Superfund Site in Granite City, IL.

Dear Mr. Clay:

The purpose of this letter is to respectfully request that the Illinois Environmental Protection Agency expedite a special waste permit for disposal of non-hazardous wastes in the state of Illinois. The wastes are being removed from several locations in Granite City, Madison, and Venice Illinois. The wastes are being removed as a remedial action related to the NL Industries/Taracorp Superfund Site in Granite City, IL. The wastes are being stabilized at the NL Industries/Taracorp, Main Industrial Site. This request has been prepared with the intention of answering each of the items listed on the IEPA Questionnaire for Expediting Permits.

The permit needs to be expedited because the sites presently assigned remedial priority by the United States Environmental Protection Agency have children living on or near them, thereby posing a potential health risk to the children.

The permit was not submitted sooner because the possibility of stabilizing lead contaminated soils for non-hazardous disposal had not been thoroughly investigated. A permit already exist for direct disposal of non-hazardous wastes from these same sites.

The non-hazardous wastes from the sites have previously been disposed of in Laidlaw's Bridgeton Missouri Landfill. Once a state permit was issued for disposal of special wastes from these sites (permit #932436), non-hazardous wastes were disposed of in Laidlaw's Roxanna landfill. Hazardous wastes similar to what will be stabilized for non-hazardous disposal under the requested permit were shipped to PDC in Peoria IL, Heritage in Indianapolis, IN, and Envirite in Harvey, IL.

EPA Region 5 Records Ctr.



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The NL Industries/Taracorp Superfund Site is presently on the USEPA's National Priorities List. The expeditious issuance of a permit would assist to decrease further potential exposure of the surrounding population and environment to dangerous lead concentrations. All persons living and working in the communities listed above would benefit from the expeditious issuance of the permit.

Several government agencies, including the USEPA, United States Army Corps of Engineers, and the Illinois Environmental Protection Agency, have recognized the importance of remediating these sites as quickly as possible. These agencies have worked in cooperation to initiate this project and implement remediation. The expeditious issuance of the non-hazardous waste permit would further exemplify the commitment to remediate sites quickly and efficiently.

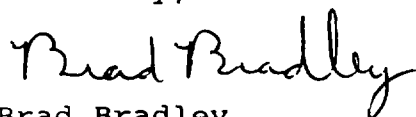
In the letter submitted for expedition of permit 932436 which IEPA granted, the possibility of on-site stabilization was mentioned as an alternative to off-site disposal for the hazardous waste. The hazardous waste is presently being shipped off-site for disposal at the Subtitle C facilities mentioned previously. Cost and feasibility studies performed determined that on-site stabilization of the waste for non-hazardous disposal represents the most cost effective and environmentally sound solution for the remediation of these sites.

Other options have been pursued, such as recycling facilities, but were not feasible due to cost and schedule constraints. Both Exide Corporation in Muncie, Indiana and Doe Run in Herculaneum, Missouri have indicated that the lead levels were not sufficient for cost effective reclamation.

The permit presently in place for this waste does not refer to the process of generation as stabilization of hazardous waste. In November of 1993, Mr. Rob Stewart and Mr. Ted Dragovich in your office indicated the need to apply for a new special waste permit based upon the change in process of generation.

Brian Culnan, Environmental Protection Specialist for the IEPA is the project contact. Mr. Culnan has graciously offered to answer questions you may have concerning this project. Mr. Culnan's telephone number is 217-782-6760.

Sincerely,



Brad Bradley  
Remedial Project Manager  
(312) 886-4742

cc: Brian Culnan, IEPA